

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

MDL NO. 2875

HON. ROBERT B. KUGLER

**NOTICE OF VIDEOTAPED DEPOSITION OF  
PLAINTIFF GARY BURNETT**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Zhejiang Huahai Pharmaceutical Co. and Princeton Pharmaceutical, Inc. will take the deposition upon oral examination of Gary Burnett on February 19, 2021 at 9:00 a.m EST at 221 Bridgewater Drive, Elwin, NC 28339. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

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Date: January 19, 2021

Respectfully submitted,

s/ Rebecca E. Bazan

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*Attorney for Defendants Princeton  
Pharmaceutical Inc., Zhejiang Huahai  
Pharmaceutical Co., Ltd., Solco Healthcare  
U.S., LLC, and Huahai U.S., Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of January, 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff John Duffy was served upon the following by e-mail, with copies to all counsel of record via service on ECF:

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